

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 21-61644-CIV-SINGHAL

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MJ CAPITAL FUNDING, LLC,
MJ TAXES AND MORE, INC., and
JOHANNA M. GARCIA,

Defendants.

RECEIVER’S SEVENTH INTERIM REPORT

Corali Lopez-Castro, as Receiver (“Receiver”) over MJ Capital Funding, LLC (“MJ Capital”), MJ Taxes and More Inc. (together, the “MJ Defendants”), Pavel Ruiz MJCF LLC, and UDM Remodeling, LLC (collectively, the “Receivership Entities”) submits this Seventh Interim Report in accordance with the Court’s Order [DE 17] appointing her as Receiver.

I. Summary of Services Rendered and Results Achieved

During January 1, 2023 through March 31, 2023 (the “Reporting Period”), the Receiver and her professionals have:

- (a) Obtained court approval of the settlement under which Wells Fargo Bank, N.A. will pay \$26.625 million (the “Wells Fargo Fund”), and the Receiver will serve as the Settlement Administrator of the Wells Fargo Fund (the “Wells Fargo Settlement”). The Wells Fargo Settlement remains subject to final approval in the class action case initiated by certain investors, and certain conditions to effectiveness must occur. The final approval hearing is currently scheduled for June 30, 2023. If the Wells Fargo Settlement is approved on a final basis and becomes effective, the Receiver estimates the Settlement Administrator will disburse over \$19.5 million from the Wells Fargo Fund to victim investors. These disbursements would be in addition to the funds the Receiver recovers and disburses through the receivership estate.

- (b) Prepared and negotiated the terms of an escrow agreement as the Settlement Administrator of the Wells Fargo Fund, and worked with a claims agent to establish a class settlement website, service lists, and various notice documents.
- (c) Continued to review and reconcile thousands of timely filed proofs of claim in order to safeguard victim investors against duplicative and improper claims and prevent those who profited from the MJ Capital scheme from receiving distributions from the receivership estate and Wells Fargo Fund. Claimants filed 12,957 proofs of claim by the July 19, 2022 claims bar date. The Receiver has completed the first level of review for all timely filed claims. The Receiver is now in the process of reconciling the investment and payment amounts asserted in the proofs of claim against the bank reconstructions, and reviewing other information and documents provided by the claimants to determine whether the amounts asserted should be rejected. The Receiver has completed this second level of review for more than 7,000 claims.
- (d) Issued over 1,000 rejection notices for timely filed proofs of claim totaling over \$20 million dollars on the basis that such claims are duplicative. This process will reduce the number of allowed claims entitled to receive distributions from the receivership estate and Wells Fargo Fund, and ensure distributions will be received by those who are entitled to distributions.
- (e) Engaged in extensive communications with investors regarding the claims review process and the status of the receivership estate via emails and telephone calls.

II. The Receivership and MJ Capital Ponzi Scheme

On August 12, 2021, the United States District Court for the Southern District of Florida entered an Order (“Receivership Order”) in an action filed by the Securities and Exchange Commission (“SEC”) appointing Corali Lopez-Castro as the Receiver over the MJ Defendants. The Court expanded the receivership to include Pavel Ruiz MJCF LLC and UDM Remodeling, LLC [DE 79, 129].

Ms. Garcia and over 400 promoters induced thousands of investors to invest an estimated \$200 million in the MJ Capital Ponzi scheme through false representations that money would be used for, and investment returns would be paid from the proceeds of, merchant cash advance (“MCA”) transactions, and the investors would receive returns of 120% to 180% annually. These

funds were primarily used to pay alleged “returns” to investors, pay “commissions” and “referral fees” to promoters, and otherwise personally benefit the Receivership Entities’ insiders and promoters. The documents and information collected and reviewed by the Receiver indicate that there was no meaningful business activity of funding and collection of MCAs.

III. The Wells Fargo Settlement and Class Settlement Process

The Receiver and certain investors who initiated a class action against Wells Fargo reached a settlement with Wells Fargo Bank under which the bank will pay \$26.625 million to resolve the Receiver’s claims that relate to the MJ Capital scheme (defined as the “Receiver’s Released Claims” in the settlement agreement) against Wells Fargo and various related parties (defined as the “Released Parties” in the settlement agreement), and the claims against the Released Parties that relate to the MJ Capital scheme of the settlement class members who do not timely opt out of the class settlement. *See* Settl. Agrmt. §§ 4.1 and 10.

The Receiver filed the Receiver’s Motion to Approval Settlement Agreement with Investor Class Representatives and Wells Fargo Bank, N.A. and for Related Relief [DE 172] on December 30, 2022. The Court entered an Order granting the motion on March 21, 2023. In the investors’ class action, the plaintiffs filed a motion for preliminary approval of the Wells Fargo Settlement on December 23, 2022, and the Court entered an Order Preliminary Approving Settlement and Providing for Notice on March 1, 2023 [DE 67, 69, Case No. 21-61749-AHS]. In the investors’ class action, the Court has scheduled the final approval hearing for June 30, 2023. The Wells Fargo Settlement remains subject to final approval and other conditions to effectiveness.

The Court has approved the Receiver serving as the “Settlement Administrator,” who is tasked with providing notice of the Wells Fargo Settlement and additional claims process,

reviewing claims, and disbursing funds in the Wells Fargo Fund. During the Reporting Period, the Receiver, as the Settlement Administrator, spent a significant amount of time drafting and negotiating the terms of an escrow agreement for the Wells Fargo Fund, and working with a claims agent to prepare the website, service lists, and various notice documents for the class settlement. On April 10, 2023, the Settlement Administrator and her claims agent provided notice of the class settlement and additional claims process via U.S. Mail to approximately 11,300 mailing addresses and approximately 18,700 email addresses.

If the Wells Fargo Settlement is approved by the Court on a final basis and becomes effective, the Receiver estimates that more than \$19.5 million will be disbursed to victim investors who have allowed claims as described in greater detail below. (The difference between the \$26.625 settlement amount and the expected distribution amount is attributable to the expected fees of class counsel and the estimated costs of implementing the settlement). The distributions from the Wells Fargo Fund will be in addition to the funds the Receiver recovers and disburses from the receivership estate. The Wells Fargo Settlement takes into account that the Receiver has already implemented a Court-approved claims process and bar date of July 19, 2022 (the “Receiver’s Bar Date”) in the receivership case. *See* Settl. Agrmt. § 7.4. Investors who previously filed a proof of claim to the Receiver by the Receiver’s Bar Date are not required to submit any additional claims in order to seek distribution from the Wells Fargo Fund, and will be advised of their right to opt out of the settlement or object. Investors who chose not to, or otherwise failed to, timely return a proof of claim form to the Receiver by the Receiver’s Bar Date, may submit a claim to the Settlement Administrator within 60 days after notice is sent. *See id.*

IV. Additional Third-Party Litigation and Investigations

The Receiver is authorized and empowered to prosecute and compromise actions or proceedings under the Receivership Order. The Receiver has investigated, and will continue to investigate, claims that can be brought against promoters, investors, and other individuals and companies who received funds from the Receivership Entities that may be recoverable as fraudulent transfers, or based on other claims and remedies, such as unjust enrichment and/or constructive trust (the “Additional Third-Party Claims”). Potential defendants include, but are not limited to, individuals and companies who failed to voluntarily surrender assets to the Receiver.

A substantial number of individuals and related companies received commissions, fees, or other payments for referring investors to the MJ Defendants, and a number of investors received more money than they invested. These commissions, fees, or other referral payments, as well as money received by investors in excess of their initial investments are avoidable and recoverable for the benefit of the receivership estate and, ultimately, victims.

In order to prosecute, and potentially settle, the Additional Third-Party Claims in an efficient and cost effective manner, and minimize administrative expense and risk to the receivership estate, the Receiver prepared certain litigation procedures and a contingency fee arrangement for her attorneys. On February 2, 2023, the Receiver filed a motion for approval of such procedures and fee arrangement. On March 21, 2023, the Court entered an Order granting the motion, approving the litigation procedures, and approving the following contingency fee arrangement: (a) 27.5% of any gross recovery realized, generated, received or obtained on any Additional Third-Party Claim pre-suit, (b) 30% of any gross recovery realized, generated, received or obtained on any Additional Third-Party Claim after filing suit but prior to the filing of an answer,

and (c) 33% of any gross recovery realized, generated, received or on an Additional Third-Party Claim after an answer is filed.

On July 8, 2022, Gabriel Galarza and Tanya Galarza, both managers with MJ Capital, and their related company, Blends by Legends, LLC (the “Galarza Parties”), filed a motion to quash subpoenas [DE 136]. On July 13, 2022, the Receiver filed her response in opposition, and on July 20, 2022, the movants filed their reply [DE 139]. On January 19, 2023, the Court entered an Order requiring the Galarza Parties and Receiver to confer in good faith regarding the status of the motion and file a joint status report advising the Court of the results. On February 26, 2023, the Receiver filed a joint status report stating that the parties were unable to resolve the issues presented in the motion. The Court set the matter for telephonic hearing on March 15, 2023, and following oral argument by counsel, the Court entered an Order requiring the parties to meet and confer with respect to the document requests for the two individuals, the Receiver to serve modified subpoenas on the two individuals, and the Galarza Parties to produce responsive documents within 14 days of service.

V. Frozen, Seized and Administered Assets

Accounts relating to Ms. Garcia remain subject to an asset freeze pursuant to the Court’s Order entered on March 21, 2023 [DE 192], which was entered with the consent of Ms. Garcia and extended the asset freeze for an additional 90 days. Approximately \$3.4 million in the accounts of certain parties involved with the MJ Capital Ponzi scheme have been seized at various banks. As described in the Fifth Report, the Receiver has submitted to the Department of Justice (“DOJ”) two petitions on behalf of the receivership estate and victim investors for remission of approximately \$1,117,000 and \$160,844.63 seized by the United States from accounts of

individuals and companies involved with the MJ Capital scheme. The Receiver continues to monitor the status of the petitions and seized funds.

The Receiver recovered 14 one-ounce gold bars from the MJ Defendants' business premises in Pompano Beach, Florida. On January 18, 2023, the Receiver sold the gold bars for a purchase price of \$25,249, and deposited the funds in the MJ Capital account as reflected in the Receiver's receipt and disbursements report attached hereto as **Exhibit A**.

VI. Claims Administration and Objections

The Receiver and her professionals continue to review and reconcile thousands of timely filed proofs of claim in order to safeguard victim investors against duplicative and improper claims and prevent those who profited from the MJ Capital scheme from receiving distributions from the receivership estate and Wells Fargo Fund. The amounts asserted in the 12,957 timely proofs of claim total more than \$200 million dollars. The claims review and reconciliation process is complicated. No comprehensive investor list or database was located in the books and records of the Receivership Entities, and the Receivership Entities did not use any formal bookkeeping or accounting system.

The Receiver is using a two-step review process. First, the Receiver reviewed whether the claimant appears in the bank reconstructions for the Receivership Entities, whether an investment agreement has been provided by the claimant or located in the Receiver's investor agreement database, and certain terms of such investor agreements. The Receiver has completed this step for all timely filed claims. Second, the Receiver is reconciling the investment and payment amounts asserted in the proofs of claim against the bank reconstructions, and reviewing other information and documents provided by the claimants to determine whether the amounts asserted should be

rejected. The Receiver has completed this second step for approximately 7,000 claims.

In addition, the Receiver has begun to issue rejection notices pursuant to the court-approved claims administration process. During the Reporting Period, the Receiver issued over 1,000 rejection notices for timely filed proofs of claim totaling over \$20 million dollars on the basis that such claims are duplicative. Most rejection notice recipients have either not raised any opposition or confirmed that they filed duplicative proofs of claim that should be removed from the claims register. A small number of recipients have sent informal responses to the Receiver stating that their claims are not duplicative. The Receiver anticipates she will issue thousands of additional rejection notices to address additional duplicative claims, claims that fail to account for payments received, and other improper claims and amounts asserted. Claimants who receive a rejection notice have an opportunity to respond and seek reconsideration under the court-approved claims process. This process will significantly reduce the number and amount of claims entitled to receive distributions from the receivership estate and Wells Fargo Fund.

VII. Communications with Investors

The Receiver continues to prioritize communicating with investors. During the Reporting Period, investors have requested information regarding their claims, rejection notices, status of the case and distributions, the Wells Fargo Settlement, and other related matters. The Receiver and her office continue to monitor and respond to numerous inquiries made via telephone and email to the Receiver, her personnel and sent to the Receiver's email addresses established for investors (MJCapital@kttlaw.com) and to issue rejection notices. The Receiver and her personnel have responded to hundreds of investor inquiries received through email correspondence and telephone calls. The Receiver appreciates and understands the investors' need for information. With respect

to the Receiver's investor website (<https://kttlaw.com/mjcapital/>), in addition to providing links to access quarterly reports, the Receiver has provided additional updates on January 2, 2023, January 26, 2023, March 3, 2023 and March 22, 2023.

VIII. Status of SEC Action and Receiver's Motions

The SEC's Amended Complaint which commenced this action sought injunctive and other relief against the MJ Defendants and Garcia arising from the sale of investments in violation of securities laws. The SEC's claims against the MJ Defendants have been resolved through the entry of consent judgments that were agreed to by the Receiver and permanently enjoin the MJ Defendants from further violations of Section 10(b) of the Securities Exchange Act of 1934 and Exchange Act Rule 10b-5, Section 17(a) of the Securities Act of 1933, and Section 5 of the Securities Act. [ECF 65, 66].

On November 15, 2022, the Court entered a Judgment as to Garcia [DE 169] permanently enjoining her from violations of Section 10(b) of the Securities Exchange Act of 1934 and Exchange Act Rule 10b-5, Section 17(a) of the Securities Act of 1933 and Section 5 of the Securities Act, and ordering Garcia to pay disgorgement of ill-gotten gains, prejudgment interest and a civil penalty in an amount to be determined by the Court upon the SEC's motion. On the same day, the Court entered an Order Granting Joint Request to Stay [DE 168] that, *inter alia*, stayed the case with respect to the SEC's request for monetary relief, allowed the SEC to bring a disgorgement and civil penalty motion once her criminal sentencing has been completed (in the event she does not prevail at trial).

All motions the Receiver filed during the Reporting Period have been addressed by the Court.

IX. Other Related Actions

The SEC and United States of America have filed the following cases against certain individuals involved with MJ Capital:

- (a) *USA v. Pavel Ramon Ruiz Hernandez*, Case No. 22-cr-20400-RS (criminal proceeding): The United States of America filed an Information against Pavel Ruiz on August 29, 2022. On February 21, 2023, the Court held a calendar call and stated in its docket minute entry that the “parties request continuance, as they work towards agreed lost amount, they agree the case will plea out.” The Court has set the plea hearing for April 26, 2023.
- (b) *Securities and Exchange Commission v. Pavel Ruiz*, Case No. 22-cv-61609: The SEC filed its Complaint for Injunctive and Other Relief and Demand for Jury Trial on August 29, 2022. On April 12, 2023, Pavel Ruiz filed a motion seeking to extend his time to file an answer because he executed a settlement with the SEC which would abrogate the need for a formal response in the SEC case, but such settlement was contingent upon his plea of guilty in the companion federal criminal matter. The motion further states that Pavel Ruiz has signed the plea agreement, the change of plea will take place on April 26, 2023, and once the plea occurs, the settlement will fully ripen and no further action will be required in this SEC case. The Court granted the motion and extended Pavel Ruiz’s deadline to file an answer to May 3, 2023.
- (c) *USA v. Christian Jose Gonzalez*, Case No. 22-cr-20563-SEITZ/Reid (criminal proceeding): The United States of America filed an Indictment against Christian Jose Gonzalez (“Gonzalez”) on November 18, 2022 for money laundering and seeking forfeiture. The Court held multiple status conferences during the Reporting Period. The final pretrial conference is scheduled for May 23, 2023, and the jury trial is set to begin on June 5, 2023.
- (d) *Securities and Exchange Commission v. Christian Jose Gonzalez*, Case No. 22-cv-61824: The SEC filed its Complaint for Injunctive and Other Relief and Demand for Jury Trial on September 27, 2022, Gonzalez filed his Answer and Affirmative Defenses with Jury Trial on November 30, 2022, and the Court entered an Order Granting Unopposed Motion to Stay on December 1, 2022 staying the matter until the above referenced criminal proceedings have been resolved against Gonzalez.

X. Retention of Professionals

The Receivership Order authorizes the Receiver to engage professionals to assist her in the performance of her duties, subject in some circumstances to Court approval. The Receiver has not

engaged any additional professionals during the Reporting Period. The Receiver has previously engaged the following professionals: Kozyak Tropin & Throckmorton, LLP (Attorneys), KapilaMukamal, CPA (Forensic Accountants), HD Investigative Group LLC (Investigators), Martin Claire & Co LLC (Auctioneer), and Stretto, Inc. (Claims Agent). Compensation of all professionals employed by the Receiver is subject to applications and Court approval.

XI. Additional Quarterly Status Report Matters Pursuant to Receivership Order

The Receivership Order directs the Receiver to report on a quarterly basis as to the following matters:

a. A summary of the operations of the Receiver

The operations of the Receiver are summarized above.

b. The amount of cash on hand, the amount and nature of accrued administrative expenses, and the amount of unencumbered funds in the estate

As of March 31, 2023, the receivership estate had cash on hand in the total amount of \$14,307,579.69.¹ The amount of unencumbered funds in the receivership estate, as of March 31, 2023, is \$14,307,579.69. Details are set forth in the Receiver's receipt and disbursements report for the Reporting Period attached hereto as Exhibit A.

The total amount and nature of known accrued administrative expenses as of March 31, 2023 is \$791,873.56, which consists of professional fees and expenses of the Receiver's professionals, as follows:

1. 20% holdback from the prior fee applications:

a. First Fee Application for August 12, 2021 through October 31, 2021 [DE 118]

¹ Of this amount, the Receiver estimates that \$1,056,065 consists of funds deposited into MJ Capital's Chase account on and after August 12, 2021, the date the Receivership Order was entered.

- i. Receiver Fees: \$13,160.00
 - ii. Kozyak, Tropin & Throckmorton Fees: \$61,706.00
 - iii. KapilaMukamal Fees: \$50,855.80
 - b. Second Fee Application for November 1, 2021 through December 31, 2021 [DE 126]
 - i. Receiver Fees: \$ 2,695.00
 - ii. Kozyak, Tropin & Throckmorton Fees: \$24,103.00
 - iii. KapilaMukamal Fees: \$33,243.80
 - c. Third Fee Application for January 1, 2022 through March 31, 2022 [DE 145]
 - i. Receiver: \$ 3,318.00
 - ii. Kozyak, Tropin & Throckmorton: \$30,391.00
 - iii. KapilaMukamal: \$39,636.20
 - iv. Stretto, Inc. (Claims Agent): \$ 5,175.12
 - d. Fourth Fee Application for April 1, 2022 through June 30, 2022 [DE 155]
 - i. Receiver: \$ 3,486.00
 - ii. Kozyak, Tropin & Throckmorton: \$26,253.00
 - iii. KapilaMukamal: \$24,003.20
 - iv. Stretto, Inc. (Claims Agent): \$80,287.68
 - e. Fifth Fee Application for July 1, 2022 through September 30, 2022 [DE 191]:
 - i. Receiver: \$ 3,619.00
 - ii. Kozyak, Tropin & Throckmorton: \$44,654.00
 - iii. KapilaMukamal: \$ 2,835.80
 - iv. Stretto, Inc. (Claims Agent): \$27,834.72
 - f. Sixth Fee Application for October 1, 2022 through December 31, 2022 [DE 195]:
 - i. Receiver: \$ 873.00
 - ii. Kozyak, Tropin & Throckmorton: \$55,978.00
 - iii. KapilaMukamal: \$ 4,520.00
 - iv. Stretto, Inc. (Claims Agent): \$ 426.00
- 2. Fees and Expenses from the Seventh Fee Application for the Period of January 1, 2023 through March 31, 2023, which will be filed with the Court and has not been approved:
 - a. Receiver:

Fees:	\$4,340.00
Expenses:	\$0.00
Hours:	12.40
 - b. Kozyak, Tropin & Throckmorton:

Fees:	\$218,665.00
Expenses:	\$1,164.81
Hours:	1,029.80

c. KapilaMukamal:	Fees:	\$4,523.00
	Expenses:	\$102.43
	Hours:	15.20
d. Stretto, Inc. (Claims Agent)	Fees:	\$9,024.00
	Expenses:	\$15,000.00
	Hours:	36.40

These amounts represent fees and expenses of the Receiver and her professionals which: (a) have been awarded by the Court and held back, and the Receiver may request payment upon final distribution of receivership assets, and (b) with respect to the period of January 1, 2023 through March 31, 2023, have been filed with the Court but not approved.

- c. A schedule of all the Receiver's receipts and disbursements (attached as Exhibit A to the Quarterly Status Report) with one column for the quarterly period covered and a second column for the entire duration of the Receivership.

A report of the Receiver's receipt and disbursements, on a quarterly and cumulative basis, is attached as Exhibit A.

- d. A description of all known Receivership Property, including approximate or actual valuations, anticipated or proposed dispositions, and reasons for retaining assets where no disposition is intended.

As of March 31, 2023, the known Receivership Property consists of: (a) cash on hand of \$14,307,579.69, (b) six gift cards of nominal value, (c) miscellaneous surrendered personal property, and (d) security deposits totaling approximately \$27,000 held by the landlord of the Pompano Beach locations which premises have been returned to the landlord.

In addition, the Receiver's investigation to date reflects that several other entities and individuals are in possession of Receivership Assets and/or Recoverable Assets as defined in the Receivership Order, i.e., assets that (a) are attributable to funds derived from investors or clients of the Defendants, (b) are held in constructive trust for the Defendants, (c) were fraudulently

transferred by the Defendants, and/or (d) may otherwise be includable as assets of the estates of the Defendants. The Receiver will continue her efforts to recover such assets.

- e. A description of liquidated and unliquidated claims held by the Receivership Estate, including the need for forensic and/or investigatory resources; approximate valuations of claims; and anticipated or proposed methods of enforcing such claims (including likelihood of success in (i) reducing the claims to judgment; and (ii) collecting such judgments).

As described above, the Receiver is continuing to investigate Additional Third-Party Claims. There are a substantial number of individuals and related companies who received commissions, fees, or other payments for referring investors to the MJ Defendants, and a number of investors who received more money than they invested. The Court recently approved litigation procedures and a contingency fee arrangement proposed by the Receiver to prosecute, and potentially settle, the Additional Third-Party Claims in an efficient and cost effective manner and minimize administrative expense and risk to the receivership estate. The litigation procedures provide that the Receiver is authorized to settle any Additional Third-Party Claims for which: (a) the asserted liability is \$100,000 or less without further Court approval, and (b) the asserted liability is greater than \$100,000 by holding settlement funds pending Court approval, and filing motions to approve settlement agreements under seal and on an omnibus basis. The Receiver will report all recoveries and attorney's fees paid relating to such claims in its quarterly fee applications, and future quarterly reports.

- f. A list of all known creditors with their addresses and the amounts of their claims.

As described above, the Receiver is in the process of reviewing timely filed proofs of claim. In the interest of protecting the privacy of investors and ensuring that the list of fraud victims does not become available to others who may use it for improper purposes, the Receiver does not

recommend at this time that a list of the known creditors and their addresses be publicly filed.

- g. The status of Creditor Claims Proceedings, after such proceedings have been commenced.

The claims bar date occurred on July 19, 2022, and 12,957 proofs of claim were filed by the claims bar date. The Receiver is in the process of reviewing and reconciling the timely filed proofs of claim and supporting documentation to determine which claims are valid and should be administered through the receivership proceeding, and which claims should be objected to and rejected. During the Reporting Report, the Receiver issued over 1,000 rejection notices for timely filed proofs of claim totaling over \$20 million dollars on the basis that such claims are duplicative.

- h. The Receiver's recommendations for a continuation or discontinuation of the receivership and the reasons for the recommendations.

The Receiver recommends the continuation of the receivership. While the operations of the Receivership Entities have been terminated, there is a substantial amount of work to be done with respect to: reviewing and reconciling proofs of claim and supporting documents, issuing rejection notices to duplicative or improper claim amounts, performing the tasks of the Settlement Administrator under the Wells Fargo Settlement such as reviewing the reconciling claim forms filed by additional claimants, prosecuting and possibly settling Additional Third-Party Claims, proposing a distribution plan, and providing distributions from the receivership estate and Wells Fargo Fund to claimants with allowed claims.

Respectfully submitted,

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Counsel for Corali Lopez-Castro, Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the clerk of the Court using CM/ECF, and the foregoing document has been served this 28th day of April, 2023: (i) via CM/ECF upon all counsel of record; (ii) via electronic mail on Johanna M. Garcia (johannaredondo@yahoo.com); and (iii) via first class U.S. mail on Johanna M. Garcia, 7814 S.W. 8 Court, North Lauderdale, Florida 33068.

By: /s/ David L. Rosendorf
David L. Rosendorf, Esq.

EXHIBIT A

Coral Lopez-Castro, as Receiver
SEC v. MJ Capital Funding, LLC, et al.
Case No. 21-61644-CIV-SINGHAL

STANDARDIZED FUND ACCOUNTING REPORT
Reporting Period: 01/01/2023-03/31/2023

FUND ACCOUNTING				
		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (as of 12/31/2022) (Note 1)			\$14,799,932.60
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income			
Line 3	Cash and Securities			
Line 4	Interest/Dividend Income	\$133,561.97		
Line 5	Business Asset Liquidation (Note 2)	\$25,249.00		
Line 6	Personal Asset Liquidation			
Line 7	Third-Party Litigation Income			
Line 8	Miscellaneous – Other			
	Total Funds Available (Lines 1-8):			\$14,958,743.57
	<i>Decreases in Fund Balance:</i>			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Receivership Operations			
<i>Line 10a</i>	<i>Disbursements to Receiver or Other Professionals</i>	\$650,848.88		
<i>Line 10b</i>	<i>Business Asset Expenses</i>			
<i>Line 10c</i>	<i>Personal Asset Expenses</i>			
<i>Line 10d</i>	<i>Investment Expenses (Note 3)</i>	\$315.00		
<i>Line 10e</i>	<i>Third-Party Litigation Expenses</i>			
	1. Attorney Fees			
	2. Litigation Expenses			
	<i>Total Third-Party Litigation Expenses</i>			
<i>Line 10f</i>	<i>Tax Administrator Fees and Bonds</i>			
<i>Line 10g</i>	<i>Federal and State Tax Payments</i>			
	Total Disbursements for Receivership Operations			\$651,163.88
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
<i>Line 11a</i>	<i>Distribution Plan Development Expenses:</i>			
<i>Line 11b</i>	<i>Distribution Plan Implementation Expenses:</i>			
	Total Disbursements for Distribution Expenses Paid by the Fund:			\$0.00
	Disbursements to Court/Other:			
<i>Line 12a</i>	<i>Investment Expenses/Court Registry Investment System (CRIS) Fees</i>			
<i>Line 12b</i>	<i>Federal Tax Payments</i>			
	Total Disbursements to Court/Other:			\$0.00
	Total Funds Disbursed (Lines 9-11):			\$651,163.88
Line 13	Ending Balance (as of 03/31/2023):			\$14,307,579.69
Line 14	Ending Balance of Fund – Net Assets:			
<i>Line 14a</i>	<i>Cash & Cash Equivalents</i>	\$14,307,579.69		

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**STANDARDIZED FUND ACCOUNTING REPORT
Reporting Period: 01/01/2023-03/31/2023**

FUND ACCOUNTING				
		Detail	Subtotal	Grand Total
	<i>Investments</i>			
<i>Line 14c</i>	<i>Other Assets or Uncleared Funds</i>			
	Total Ending Balance of Fund – Net Assets			<u>\$14,307,579.69</u>
OTHER SUPPLEMENTAL INFORMATION				
		Detail	Subtotal	Grand Total
Line 15-19		N/A		

Note 1: The Receiver estimates that the Beginning Balance includes approximately \$1,056,065 of funds deposited into MJ Capital’s Chase Bank Account on and after August 12, 2021.

Note 2: "Business Asset Liquidation" consists of proceeds from the sale of 14 gold bars each one ounce.

Note 3: Represents bank fees